



December 12, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket 18-353, Petition for Waiver of the April 17, 2020 deadline for the “transition” of existing Part 90 Citizens Broadband Radio Service (CBRS) operations to the new Part 96; Comments of Virginia Everywhere, LLC dba All Points Broadband

Dear Ms. Dortch:

I am writing on behalf of Virginia Everywhere, LLC (dba All Points Broadband). All Points is a member of the Wireless Internet Service Providers Association (“WISPA”) and strongly supports the joint petition of WISPA and Utilities Technology Council (“UTC”) for waiver of the April 17, 2020 deadline for the “transition” of existing Part 90 operations in the 3650-3700 MHz band to the new Part 96 Citizens Broadband Radio Service (CBRS) rules that require operations under the control of a Spectrum Access system (SAS). WISPA and UTC have asked the FCC to extend the transition deadline to January 8, 2023 – the date that the last 3650-3700 MHz license will expire.

As background, All Points is a fixed wireless Internet service provider serving northern and southwestern Virginia, central Kentucky, and communities in Maryland and West Virginia. All Points has been in business for four years and now serves over 20,000 end-users in mostly rural communities. We raised private, at-risk capital from institutions and individuals which we deploy to bring broadband service to areas where there are no terrestrial alternatives or a lack of choice. Our entrepreneurial company is an example of the private sector’s willingness to invest in rural broadband if there is a sensible regulatory environment that encourages investment.

At the time the FCC established the grandfathering rules and the five-year transition period, it was believed that this would be a sufficient period of time for 3650-3700 MHz licensees to transition their operations to Part 96 CBRS. The transition requires the following activities:

- Professional installation of equipment certified under Part 96 to operate under the new technical rules and under the control of the SAS.
- Certification of the SAS and the Environmental Sensing Capability (ESC) for higher power operations.
- Authorization by the FCC that GAA operations can commence.

Unfortunately, the FCC has not completed certification of any SAS or ESC at this time, and has certified only a few equipment options. As a result, the FCC cannot complete testing and

cannot authorize GAA operations, and grandfathered licensees thus cannot begin the process of transitioning. It will likely be several months before that can occur.

Extending the transition period will benefit the public interest by (i) enabling providers to spread out the costs and resources over three years instead of one, (ii) enabling the supply chain to provide competitive, compliant equipment options, and (iii) providing incentives for operators to install interoperable equipment, which will make overall SAS/ESC governance of the band more efficient

All Points Broadband strongly supports the extension of the transition deadline as requested in the petition. Thank you for your time and consideration.

Sincerely,

/s/

James G. Carr
Chief Executive Officer